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COMMERCE & INDUSTRY INSURANCE COMPANY

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

COMMERCE & INDUSTRY INSURANCE)	CASE NO. 2:12-CV-01219-APG-CWH
COMPANY,)	
)	JOINT MOTION TO EXTEND THE
Plaintiff,)	TIME FOR FILING OF THE JOINT
vs.)	PRETRIAL ORDER – SECOND
)	REQUEST
STARWOOD MANAGEMENT, LLC, et al.,)	[PROPOSED ORDER]
)	
Defendants.)	<u>DATES:</u>
)	Current: December 12, 2014
)	Requested: March 12, 2015
)	

Plaintiff, Commerce & Industry Insurance Company, hereby moves the court for an order extending the time for the parties to file the joint pretrial order in this case. Plaintiff's motion for summary judgment (40) was heard and was denied by the court on September 12, 2014 (49). The order directed the parties to file the joint pretrial order by October 13, 2014 – 30 days following the denial of the motion. The parties need additional time to fully and properly comply with the

requirements of Local Rules 16-3 and 16-4 for the preparation and filing of the order, and plaintiff therefore respectfully moved the court for an order extending the filing deadline from October 13, 2014 to December 12, 2014. The request was granted by the Court on October 10, 2014 (51). No trial date has been set in this case and none is likely to be set for an extended period of time as reflected in the court's statements and the order from the September 12, 2014 hearing (49). Plaintiff's and defendant's attorneys have conferred about this motion and defendant agrees to and joins this motion for an extension of ninety (90) days, as the parties require additional time to file the joint pretrial order, as further described below.

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Therefore, the parties hereby respectfully move the court for an order extending the filing deadline of the pretrial order from December 12, 2014 to March 12, 2015. The reason for this motion and request are that the requirements for the joint pretrial order contained in Local Rules 16-3 and 16-4 require both sides to spend considerable time to draft, exchange and reach agreement on the form and content of the order and the related documents to be submitted with the proposed order. Since the court has indicated that the case will be on trailing status for an extended time, the parties seek the court's indulgence for additional time to properly prepare and submit the joint pretrial order. This should not affect the trial scheduling of the case.

Respectfully submitted.

DATED: December 1, 2014

WILSON ELSER MOSKOWITZ EDELMAN
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IT IS SO ORDERED:

DATED: 12/3/14



United States Magistrate Judge